

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re:**

:

**Chapter 11**

:

**RUDOLPH W. GIULIANI**

:

**Case No. 23-12055 (SHL)**

**a/k/a RUDOLPH WILLIAM GIULIANI,**

:

:

**Debtor.**

:

-----X

**DECLARATION OF BRIAN EBERT IN SUPPORT OF  
THE MOTION OF GLOBAL DATA RISK LLC FOR LEAVE  
TO REDACT AND FILE UNDER SEAL CERTAIN CONFIDENTIAL  
INFORMATION RELATED TO GLOBAL DATA RISK LLC'S FEE APPLICATIONS**

I, Brian Ebert, under penalty of perjury, declare as follows:

1. I am a director at Global Data Risk LLC ("GDR"). GDR's business address is 14 Wall Street, 20th Floor, New York, NY 10005.

2. I am familiar with the matters set forth herein and submit this declaration (this "Declaration") in support of the *Motion of Global Data Risk LLC for Leave to Redact and File Under Seal Certain Confidential Information Related to Global Data Risk LLC's Fee Applications* (the "Motion") filed contemporaneously herewith.<sup>1</sup> Except as otherwise noted, all facts in this Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents and information supplied to me by my colleagues at GDR.

3. I understand that on January 12, 2024, the Committee was appointed by the U.S. Trustee, and, on February 9, 2024, the Committee selected GDR as its specialized forensic financial advisor. On April 19, 2024, the Court entered an order approving the Committee's retention of GDR.

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

4. In connection with the services that GDR is providing to the Committee as its specialized forensic advisor, Global Data Risk utilizes the services of part-time and full-time team members in numerous disparate locations. Of the sixteen employees GDR utilizes on this engagement, GDR anticipates that it will utilize the services of five employees (the “Subject Employees”) whose names GDR will seek to redact in its Fee Applications (as defined below). Besides the Subject Employees, all other GDR employees providing services in connection with this chapter 11 case will be identified in the Fee Applications.

5. In general, the Subject Employees provide asset tracing and investigation services, primarily internationally. The Subject Employees live and/or frequently work abroad, including in Eastern Europe, the Middle East and the Caribbean.

6. Given the nature of the Subject Employees’ work, GDR, in the ordinary course of its business, takes steps to protect the identities of the Subject Employees and does not publicly identify these individuals as employees of GDR. For example, the Subject Employees are not listed publicly on GDR’s website or otherwise publicly affiliated with GDR. GDR takes these steps primarily to ensure that the Subject Employees can perform their duties effectively and, in some instances, to ensure their safety.

7. GDR wishes to continue to maintain the confidentiality of the identities of the Subject Employees with respect to this matter as well. Redacting and filing under seal the names of these Subject Employees is necessary to ensure that the Subject Employees’ effectiveness on this matter and other matters unaffiliated with this engagement is not undermined.

8. Additionally, in light of the high profile and politicized nature of this engagement, GDR will be able to more effectively provide services to the Committee if the identities of the Subject Employees are not made public.

9. In sum, GDR only seeks to redact and file under seal the names of the Subject Employees in GDR's Monthly Fee Statements, Interim Fee Applications and Final Fee Applications (collectively, the "Fee Applications"). The content of the Fee Applications will otherwise be fully available to the public.

I declare under penalty of perjury that the foregoing is true and correct on this 6th day of June, 2024.

/s/ Brian Ebert

Name: Brian Ebert